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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 JULIUS BRADFORD,

11 Petitioner,

12 vs.

13 WILLIAM GITTERE, *et al.*,

14 Respondents.

Case No. 2:13-cv-1784-RFB-EJY

**MOTION FOR ENLARGEMENT OF TIME
TO FILE REPLY IN SUPPORT OF MOTION
TO STRIKE (FIRST REQUEST)**

15 Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada,
16 and Gerri Lynn Hardcastle, Deputy Attorney General, hereby move this Court for a seven-day
17 enlargement of time, or up to and including Tuesday, December 6, 2022, to file and serve their reply in
18 support of their motion to strike (ECF No. 194) Petitioner Julius Bradford's (Bradford) motion to
19 correct pleadings (ECF No. 193).

20 This motion is based on the provisions of Rule 6(b)(1)(A) of the Federal Rules of Civil
21 Procedure and the attached Declaration of Counsel, as well as all other papers on file herein.

22 Respondents have not requested any previous enlargements of time to reply. Respondents make
23 this motion in good faith and not for the purpose of unnecessary delay.

24 RESPECTFULLY SUBMITTED this 28th day of November, 2022.

25 AARON D. FORD
26 Attorney General

27 By: /s/ Gerri Lynn Hardcastle
GERRI LYNN HARDCASTLE (Bar No. 13142)
28 Deputy Attorney General

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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 JULIUS BRADFORD,

11 Petitioner,

12 vs.

13 CALVIN JOHNSON, *et al.*,

14 Respondents.

Case No. 2:13-cv-01784-RFB-EJY

**DECLARATION OF COUNSEL (IN
SUPPORT OF MOTION FOR
ENLARGEMENT OF TIME TO REPLY IN
SUPPORT OF MOTION TO STRIKE (FIRST
REQUEST))**

15 I, Gerri Lynn Hardcastle, hereby state, based on personal knowledge and/or information and
16 belief, that the assertions of this declaration are true:

17 1. I am a Deputy Attorney General employed by the Attorney General's Office of the State
18 of Nevada in the Post-Conviction Division, and I make this declaration in support of Respondents'
19 motion for enlargement of time.

20 2. Through this motion, I am requesting an enlargement of time of seven days, or up to and
21 including Tuesday, December 6, 2022, to file Respondents' reply in support of their motion to strike
22 Bradford's motion to correct pleadings. This is Respondents' first request for an enlargement of time to
23 reply.

24 3. My clients' reply is currently due tomorrow, November 29, 2022.

25 4. I am unable to complete my clients' reply today because I am currently out-of-town on
26 annual leave and will not return to work until Wednesday, November 30, 2022. I have been out-of-
27 town since Sunday, November 20, 2022, so I was unaware Bradford had filed his opposition to the

28 / / /

1 motion to strike until my Division Chief alerted me of the deadline earlier today. I have now read
2 Bradford's opposition, and I will be able to file the reply by next Tuesday, December 6, 2022.

3 5. I am moving for this enlargement of time in good faith and not for the purpose of unduly
4 delaying the ultimate disposition of this case.

5 6. Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the
6 foregoing is true and correct.

7 Executed on this 28th day of November, 2022.

8 By: /s/ Gerri Lynn Hardcastle
9 GERRI LYNN HARDCastle (Bar No. 13142)
Deputy Attorney General

10 11 IT IS SO ORDERED:

12 13 
14 RICHARD F. BOULWARE, II
15 United States District Judge
16 DATED this 29th day of November, 2022.

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 28th day of November, 2022, I served a copy of the foregoing **MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY IN SUPPORT OF MOTION TO STRIKE (FIRST REQUEST)** by U.S. District Court CM/ECF electronic filing to:

Jeremy C. Baron
Assistant Federal Public Defender
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Jeremy_baron@fd.org

/s/ Carrie L. Crago